

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**WSOU INVESTMENTS, LLC d/b/a  
BRAZOS LICENSING AND  
DEVELOPMENT,**

*Plaintiff,*

v.

**DELL TECHNOLOGIES INC.,  
DELL INC., AND EMC  
CORPORATION, LTD.,**

*Defendants.*

**Civil Action No.: 6:20-cv-00473-ADA  
Civil Action No.: 6:20-cv-00475-ADA  
Civil Action No.: 6:20-cv-00476-ADA  
Civil Action No.: 6:20-cv-00477-ADA  
Civil Action No.: 6:20-cv-00480-ADA  
Civil Action No.: 6:20-cv-00481-ADA  
Civil Action No.: 6:20-cv-00482-ADA  
Civil Action No.: 6:20-cv-00485-ADA  
Civil Action No.: 6:20-cv-00486-ADA**

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION FOR WITHDRAWAL OF COUNSEL FROM CASE**

**TO THE HONORABLE COURT:**

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos”) hereby moves to withdraw attorney Jayita Guhaniyogi as counsel of record for Plaintiff.

Lawyers with Kasowitz Benson Torres LLP and Steckler Wayne Cherry & Love PLLC will remain as counsel for Plaintiff.

This withdrawal will not cause a continuance or delay and will not prejudice Brazos or any other party to this action.

Defendants are not opposed to this motion.

Dated: April 6, 2022

RESPECTFULLY SUBMITTED,

By: /s/ Jonathan K. Waldrop

Jonathan K. Waldrop (CA Bar No. 297903)

(Admitted in this District)

jwaldrop@kasowitz.com

Darcy L. Jones (CA Bar No. 309474)

(Admitted in this District)

djones@kasowitz.com

Marcus A. Barber (CA Bar No. 307361)

(Admitted in this District)

mbarber@kasowitz.com

ThucMinh Nguyen (CA Bar No. 304382)

(Admitted in this District)

tnguyen@kasowitz.com

John W. Downing (CA Bar No. 252850)

(Admitted in this District)

jdowning@kasowitz.com

Heather S. Kim (CA Bar No. 277686)

(Admitted in this District)

hkim@kasowitz.com

**KASOWITZ BENSON TORRES LLP**

333 Twin Dolphin Drive, Suite 200

Redwood Shores, California 94065

Telephone: (650) 453-5170

Facsimile: (650) 453-5171

Paul G. Williams (GA Bar No. 764925)

(Admitted in this District)

pwilliams@kasowitz.com

**KASOWITZ BENSON TORRES LLP**

1230 Peachtree Street N.E., Suite 2445

Atlanta, Georgia 30309

Telephone: (404) 260-6080

Facsimile: (404) 260-6081

Joshua A. Whitehill (NY Bar No. 4766473)

(Admitted *pro hac vice*)

jwhitehill@kasowitz.com

Julianne Laporte (NY Bar No. 5547906)

(Admitted *pro hac vice*)

jlaporte@kasowitz.com

Howard L. Bressler (NY Bar No. 2487379)

(Admitted *pro hac vice*)

hbressler@kasowitz.com

Shelley Ivan (NY Bar No. 4338067)

(Admitted *pro hac vice*)

sivan@kasowitz.com

Hershy Stern (NY Bar No. 4631024)

(Admitted *pro hac vice*)

hstern@kasowitz.com

Noah P. Dorman (DC Bar No. 1779821)  
(Admitted *pro hac vice*)  
ndorman@kasowitz.com  
**KASOWITZ BENSON TORRES LLP**  
1633 Broadway  
New York, NY 10019  
Telephone: (212) 506-1700  
Facsimile: (212) 506-1800

Mark D. Siegmund (TX Bar No. 24117055)  
mark@swclaw.com  
Craig D. Cherry (TX Bar No. 24012419)  
craig@swclaw.com  
Justin Allen (TX Bar No. 24081977)  
justin@swclaw.com  
**STECKLER WAYNE CHERRY & LOVE PLLC**  
8416 Old McGregor Road  
Waco, TX 76712  
Telephone: (254) 651-3690  
Facsimile: (254) 651-3689

**Attorneys for Plaintiff**  
**WSOU INVESTMENTS, LLC d/b/a**  
**BRAZOS LICENSING AND**  
**DEVELOPMENT**

**CERTIFICATE OF CONFERENCE**

This is to certify that on April 4, 2022, counsel for Plaintiffs conferred with counsel for Defendants regarding the contents of this motion, and counsel for Defendants are unopposed to the relief sought.

*/s/ Jonathan K. Waldrop*  
Jonathan K. Waldrop

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served or delivered electronically via email to all counsel of record, on April 6, 2022.

*/s/ Jonathan K. Waldrop*  
Jonathan K. Waldrop